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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**EUGENE DIVISION**

**UNITED STATES OF AMERICA,**

**6:22-mc-791**

**Plaintiff,**

**v.**

**UNOPPOSED MOTION TO  
EXTEND 90-DAY PERIOD  
PURSUANT TO  
18 U.S.C. § 983(a)(3)(A)**

**\$16,481.00 U.S. CURRENCY, *in rem*,**

**Defendant.**

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Joshua Gibbs, attorney for claimant Harvey Caron, who concurs with this extension.

On May 13, 2022, Harvey Caron filed a claim in a non-judicial civil forfeiture proceeding by U.S. Customs and Border Protection to \$16,481.00 U.S. Currency seized from Harvey Caron on or about August 25, 2021.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Harvey Caron, agree to extend the time in which the United States will file a complaint for forfeiture against the

\$16,481.00 or to obtain an indictment alleging that the assets are subject to forfeiture. Harvey Caron agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Monday, September 12, 2022.

Harvey Caron agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until September 12, 2022, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Harvey Caron shall not seek its return for any reason in any manner.

DATED: **August 11, 2022**

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

s/ Judith R. Harper  
**JUDITH R. HARPER**  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period  
and a proposed Order on the party herein by sending via email on August 11, 2022 to:

Joshua Gibbs  
[Josh@JoshGibbsLaw.com](mailto:Josh@JoshGibbsLaw.com)  
Attorney for claimant Harvey Caron

s/ Dawn Susuico  
DAWN SUSUICO  
Paralegal